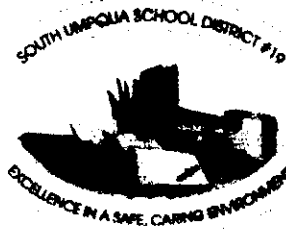


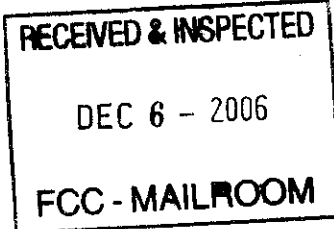
Chris Davidson
Director of Fiscal Services
558 S.W. Chadwick Lane
Myrtle Creek, OR 97457



chris.davidson@susd.k12.or.us
Phone (541)863-5211
FAX (541)863-5212

November 27, 2006

FCC Office of the Secretary
445 12th Street SW
Washington, DC 20554



Re: Docket No. 02-6

To Whom It May Concern:

Please consider this Request for Review on behalf of South Umpqua School District, BEN 145020, with regards to the decision to deny our school district's e-rate funding for telecommunication services for the 2006-2007 funding year.

Our district had two funding requests denied, FRN 1484977 and FRN 1484277. We originally thought that these requests were filed with an incorrect SPIN. The funding decisions were denied, as the denial stated the SPIN listed was not a telecommunications provider, therefore we compiled a filing inline with the Bishop-Perry decision with what we thought was a corrected SPIN and it was submitted. This Bishop-Perry filing was disregarded.

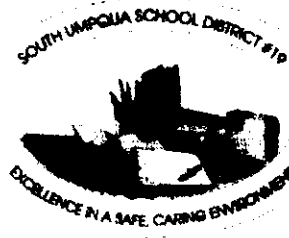
We were informed it was disregarded because it was not filed properly for an FY2006 correction. However, in reviewing the USAC website, there are two different sets of filing instructions for Bishop Perry filings. We followed the procedure we found as it was laid out on the USAC web site on the Schools and Libraries home page (attached **Exhibit A**). Nowhere on these pages does it say that FY2006 corrections need to be handled differently than other corrections.

After our filing was disregarded, we called the SLD and were directed to another spot on the website from the USAC home page that discussed what the correctable errors were. In the midst of lining out what errors were correctable there is a paragraph that outlines how FY2006 corrections are to be handled (attached **Exhibit B**).

This decision was appealed with USAC due to the fact that, acting in good faith, we followed the instructions we found provided by USAC on their website that we thought were applicable. USAC stated that had they even accepted the Bishop-Perry filing that neither SPIN belonged to a provider that was an approved telecommunications provider.

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Director of Fiscal Services

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Having received this information we looked into things further. Our original SPIN that we provided was actually correct. There was confusion between the name of our provider (Rio Communications) and their parent company's name (UIDC Telecom) that caused us to pursue the wrong appeal. There is a Rio Communications out of Texas that is listed with the SLD.

We contacted our provider about the fact that we were told they were not an approved provider. When we were in the bidding process both UIDC Telecom and Rio Communications could be found on the USAC website when doing a SPIN search. Both entities at the time had a blank in the box labeled "Eligible Telecom Provider." However, according to the USAC website it states that the company may be waiting to be researched by the SLD. Rio Communications informed us that their paperwork had been submitted and was just awaiting final approval. Currently the parent company, UIDC Telecom, shows as an eligible provider (attached **Exhibit C**).

This is my first time working through the E-Rate process and it has been very challenging to learn the proper way to do everything. Despite the SPIN confusion and other issues, I have worked diligently in good faith to meet all requirements and deadlines required by the SLD. Because of this I request that careful consideration be given to our appeal of the decision to deny our funding for 2006-2007 for telecommunication services.

Should you have any questions regarding any of the information provided, please do not hesitate to contact me.

Sincerely,

Chris Davidson
Director of Fiscal Services

Exhibit A

USAC

Universal Service Administrative Company

Applicants

The Schools and Libraries Program of the Universal Service Fund makes discounts available to eligible schools and libraries for telecommunication services, Internet access, and internal connections. The program is intended to ensure that schools and libraries have access to affordable telecommunications and information services.

Latest News, Important Notices, and Reminders**i** **Reminder:****i** **Reminder:****i** **Latest News:****i** **Important Notice:****🕒** **Reminder:****Service Providers**

The Schools and Libraries Program reimburses telecommunications, Internet access, and internal connections providers for discounts on eligible services provided to schools and libraries. While schools and libraries apply for these discounts, USAC works in conjunction with service providers to make sure these discounts are passed on to program participants.

[FCC Proposes to Reissue FCC Forms 472, 473, 474, 479, 486 and 500 \(9/15/2006\)](#)

[2006 Fall Training Agenda and Presentation Materials \(8/31/2006\)](#)

[FCC Issues Public Notice on Eligible Services List \(7/27/06\)](#)

Information on Bishop Perry Order

[FCC Order \(FCC 06-54\) \[PDF, 233kb\]](#)

[List of correctable ministerial and clerical errors \[PDF, 50kb\]](#)

[What USAC is doing](#)

[Help and FAQs](#)

[USAC Announces 2006 Schools and Libraries Training \(4/28/06\)](#)

Hurricane Katrina Universal Service Fund Relief Information **▶**

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Universal Service Administrative Company

What Applicants Need to Do

Funding Year 2006 applicants can correct certain ministerial and clerical errors on FY2006 Forms 470 and Forms 471 and/or can file required certifications, even if they have already received a funding commitment or a funding denial for FY2006.

Who is eligible to request corrections?

To be eligible to submit requests for correcting program forms, you must meet both of the following conditions:

1. Had a Form 470 posted to the USAC website on or before January 19, 2006 AND
2. Submitted a Form 471 for Funding Year 2006 that was received by USAC or postmarked by 11:59 p.m. EST on February 16, 2006 — even if this form failed to meet Minimum Processing Standards, was not certified, was certified outside the window, or has already been issued a Funding Commitment Decision Letter.

What is the deadline for submitting a correction?

You have 15 days to submit your corrections and/or certifications. Your deadline for submitting allowable corrections will be calculated as follows:

1. If you are actively working with PIA on an application under review, your deadline is August 2, 2006, which is 20 days from July 14, 2006, the date USAC will issue the Remand Correction Deadline Letter. (Applicants have 15 days after they receive this letter to submit corrections, and USAC presumes that they have received the letter five days after it is postmarked.)
2. If you update your contact information or begin to actively work with PIA on the review of your application, your countdown starts when PIA informs you that you have 15 days to respond to its request for information.
3. If you are unavailable during the summer (i.e., if PIA cannot make a successful two-way contact) or if USAC has already issued a Funding Commitment Decision Letter for your application, your 15 days starts on September 12, 2006, shortly after the summer period for suspending the 15-day Deadline for Information Requests ends. **You must submit your corrections on or before September 26, 2006.**

How should I prepare to submit a correction?

1. Review the "List of Correctable Ministerial and Clerical Errors" posted on the website to be sure that the correction you want to make is allowable.
2. If your form failed to meet Minimum Processing Standards, review the letter sent by USAC with your returned form. That letter details all of the errors that caused USAC to return your form.
3. **If the status of your form is Certified – Out Of Window, no action is necessary on your part.** USAC will change the status of your form to Certified – In Window and begin the review process for your form.
 - a. To find the certification status of a Form 470, go to the Apply Online area of the website and display your Form 470 using the Form 470 Search Posted function. If the entry in "Certification Received Date" is after January 19, 2006, USAC considers that Form 470 to be Certified Out-Of-Window.
 - b. To find the certification status of a Form 471, go the Apply Online area of the website and find your form with the Form 471 Application Status tool or display your form using the Form 471 Display function. You can then see if the status of the form is Certified Out-Of-Window.

How do I submit a correction?

1. To correct an error on a form or certification that was rejected for failing to meet Minimum Processing Standards:
 - Make a copy of your form or certification and your rejection letter.
 - Mark your corrections on the form or certification.
 - Submit both the corrections and the letter to USAC. If you prefer, you can also send in a new certification.
 - Be sure to include your Entity Number, Applicant's Form Identifier, Contact Person Name, Contact Telephone Number and, if you have it, your Form 470 or 471 Application Number.
 - **DO NOT certify your form online, because the system will automatically send an Out-of-Window letter and USAC may not realize that you have certified your form.**

submit a missing certification:

- Print a copy of your certification page OR print a new certification page and mark the appropriate boxes
- Fill in the other requested information.
- Sign and date the certification
- Submit the certification to USAC.
- Be sure to include your Entity Number, Applicant's Form Identifier, Contact Person Name, Contact Telephone Number and, if you have it, your Form 470 or 471 Application Number.
- **DO NOT certify your form online, because the system will automatically send an Out-of-Window letter and USAC may not realize that you have certified your form.**

NOTE: If you submitted a certification but the status of your form is not Certified, you should submit a new certification.

- To find the certification status of a Form 470, go to the Apply Online area of the website and display your Form 470 using the Form 470 Search Posted function. If there is no entry in "Certification Received Date," USAC does not consider that Form 470 to be Certified.
- To find the certification status of a Form 471, go the Apply Online area of the website and find your form with the Form 471 Application Status tool or display your form using the Form 471 Display function. If the status of your form is Complete, USAC does not consider that Form 471 to be Certified.

3. To correct other ministerial or clerical errors:

- Make a copy of your form. You can use a copy of the form you originally submitted or you can print a copy of your form using the Form 471 Application Display tool in the Search Tools area of the USAC website.
- Mark your corrections on the copy.
- Submit the corrected version to USAC.

Where do I submit my corrections?

1. Write "FCC 06-54 Corrections" at the top of every page to clearly identify your request.
2. Write your Form 470 or Form 471 Application Number at the top of every page.
3. Submit your request as follows:

By:	To:	And:
Email	FCC06-54corrections@sl.universalservice.org	Scan your submission, preferably in TIF file format with a file size less than 10 Megabytes
Fax	(973) 599-6526	Write the number of pages of your submission on your cover sheet
Mail or delivery service	FCC 06-54 Corrections Schools and Libraries Division — Correspondence Unit 100 South Jefferson Road P.O. Box 902 Whippany, New Jersey 07981	Keep proof of mailing or delivery

Last modified on 7/10/2006

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Important Notice Regarding Correctable Errors on FCC Forms 470 and 471

In the recent *Bishop Perry Order*,¹ the FCC directed USAC "to provide all E-rate applicants with an opportunity to cure ministerial and clerical errors on their FCC Form 470 or FCC Form 471, and an additional opportunity to file the required certifications."² The FCC further indicated that "applicants shall have 15 calendar days from the date of the receipt of notice in writing by USAC to amend or refile the FCC Form 470, FCC Form 471 or associated certifications."³

USAC is publishing this list of correctable errors today. Errors are broken into the following categories:

- A. Errors on Forms 470 that were previously Minimum Process Standards rejections. These corrections must be made before the Form 470 can be posted, which starts the 28-day clock.
- B. Errors on Forms 470 that can be corrected by amending the Form 470. These corrections are made to forms that are already posted, and do not affect the 28-day clock.
- C. Errors on Forms 471 that were previously Minimum Process Standards rejections. These corrections must be made before the Form 471 can be data entered and reviewed.
- D. Errors on Form 471 that can be corrected by amending the Form 471. These corrections are made to forms that are already data entered.

Applicants who completed applications during the window, but who did not certify within the window, will be given 15 days to submit their certification. In order to take advantage of this, your application must be received by USAC during the window and the only thing that was missing was the certification.

Notification for FY2006

All Applicants who applied in FY 2006 (whether you have received your FCDL or not) should carefully review all of the corrections that can be made to their forms. Applicants have 15 days, starting on July 14, 2006 to provide USAC with any allowable corrections. Corrections are due on August 2, 2006.

Because the filing window for FY 2006 has already closed, and all Forms 470 had to be posted for at least 28 days before the close of the window, only some of the errors for the Form 470 can be corrected at this time. They are:

- 1. Form 470 Certification submission deadline
- 2. Form 470 Certification received by USAC but missing a signature
- 3. Form 470 Contact person name changes
- 4. Form 470 Item 17 – List of Billed Entities

All correctable errors listed for the Form 471 are correctable now.

Starting with FY 2007, applicants will be able to take full advantage of the complete list of correctable errors.

¹ *Request for Review of the Decision of the Universal Service Administrator by Bishop Perry Middle School, New Orleans, LA*, CC Docket No. 02-6, Order, FCC 06-54 (2006) (*Bishop Perry Order*).

² *Id.* ¶ 23.

³ *Id.* ¶ 23

How to Correct an Error for FY 2006 Form

Applicants who wish to submit a correction should follow the instructions listed on page 4 of the RAL for making changes.

Allowable corrections received within 15 days of notification from USAC will be reflected in the Funding Commitment Decision Letter.

USAC List of Correctable Ministerial and Clerical Errors

In the recent *Bishop Perry Order*,⁴ the FCC directed USAC "to provide all E-rate applicants with an opportunity to cure ministerial and clerical errors on their FCC Form 470 or FCC Form 471, and an additional opportunity to file the required certifications."⁵ After receiving notification from USAC, applicants will have 15 calendar days to correct these errors. (It should be noted that applicants always have the option of correcting any error on a form by resubmitting that form, as long as they can comply with the any necessary deadlines.)

The following list explains which items on the FCC Form 470 and FCC Form 471 can be corrected by applicants within 15 days of notification by USAC.

FCC Form 470

There are two categories of errors that can be corrected without refileing the Form 470. Correction to items listed in the first category, Minimum Processing Standards Errors, with the exception of the Certification Deadline and the Authorized Person Signature, *must be received by USAC before the form can be posted, which starts your 28-day clock*. Corrections to the second category, Errors that can be corrected by amending the Form 470, can be made after the Form 470 has been posted.

A. Minimum Processing Standards Errors

The following items previously listed in the FCC Form 470 Instructions as Minimum Processing Standards will no longer be cause for automatic rejection. However, USAC must receive the missing information within 15 days of notification from USAC before the FCC Form 470 can be posted. The 28-day clock starts once the form is posted. It should be noted that if you are going to take full advantage of the time to make corrections, that will require at least 43 days to process (15 days to correct plus 28 days for posting.) **If you do not provide the information within 15 days, your form will be rejected for failing Minimum Process Standards and any FRN on a Form 471 will be denied.** To avoid these errors, USAC encourages applicants to use the Apply Online system.

ERROR LOCATION	CORRECTIVE ACTION ALLOWED
FCC Form 470 – Funding Year Specific	Applicants who use the wrong version of the form from a prior funding year can make corrections to the correct version of the form within 15 days of notification from USAC. This item is required before the form can be posted which starts the 28-day posting requirement.

⁴ *Request for Review of the Decision of the Universal Service Administrator by Bishop Perry Middle School, New Orleans, LA*, CC Docket No. 02-6, Order, FCC 06-54 (2006) (*Bishop Perry Order*).

⁵ *Id.* ¶ 23.

ERROR LOCATION	CORRECTIVE ACTION ALLOWED
FCC Form 470 Block 1 Items 1 and 3 Applicant Name and Contact Information	As long as there is sufficient contact information on the form to be able to make contact with someone, applicants can provide the missing contact information within 15 days of notification from USAC. This information is required before the form can be posted which starts the 28-day posting requirement.
FCC Form 470 Block 2 Items 8, 9, 10, and 11 Summary Description of Needs or Services Requested (Telecommunications Services, Internet Access, Internal Connections Other than Basic Maintenance, and Basic Maintenance of Internal Connections)	Applicants who did not enter <i>any</i> information in <i>any</i> of these items can correct this error by providing the missing information within 15 days of notification from USAC. This information is required before the form can be posted which starts the 28-day posting requirement. Applicants who seek to correct information already posted for these items or who want to add a category of service that was not entered when the form was posted will not be allowed to make those corrections. Paper filers can correct these items before their form is posted, and online filers can file a new Form 470 as long as there is still time in the filing window.
FCC Form 470 certification submission deadline	For applications completed within the filing window, applicants can file the certifications within 15 days of notification from USAC.
FCC Form 470 Block 5 Item 27 Signature of Authorized Person	Applicants who forget to sign their certification page can correct this error within 15 days of notification by USAC. To avoid this error, USAC encourages applicants to use their PIN to e-certify.

B. Errors that can be corrected by amending the Form 470

For the items listed below, applicants can amend their Form 470 without restarting the 28-day clock -- you need only to provide the information within the 15 days after notification from USAC.

ERROR LOCATION	CORRECTIVE ACTION ALLOWED
FCC Form 470 Block 1 Items 6a Contact Person Name	Applicants will be able to submit corrections to the contact information within 15 days of notification from USAC. Before making the change, the correction will be reviewed to ensure that the change does not circumvent the FCC's competitive bidding requirements.
FCC Form 470 Block 4 Item 16c Eligible Entities That Will Receive Services – School districts, library systems or consortium applications that serve multiple entities	Applicants can submit corrections to the number of eligible entities within 15 days of notification from USAC, as long as it is not a significant departure from the scope of the original request and is due to clerical error.
FCC Form 470 Block 4 Item 17 Billed Entities that will be paying the bills information.	Applicants can submit corrections to the list of Billed Entities that will cite the Form 470 within 15 days of notification from USAC.

FCC Form 471

Applicants who discover any error on their FCC Form 471 always have the option of filing a new FCC Form 471 as long as they can do so within the filing window. The following two categories of errors, however, can be corrected without refiling the FCC Form 471.

C. Minimum Processing Standards Errors

Some items previously listed in the FCC Form 471 Instructions as Minimum Processing Standards will no longer be cause for automatic rejection. However, USAC must receive the missing information within 15 days of notification from USAC before the Form 471 can be data entered and reviewed for funding. If you do not provide the information within 15 days, your form or FRN will be rejected for failing Minimum Process Standards. You can avoid these errors by using the Apply Online system.

ERROR LOCATION	CORRECTIVE ACTION ALLOWED
FCC Form 471 – Funding Year Specific	Applicants who use the wrong version of the form from a prior funding year can make corrections to the current version of the form within 15 days of notification from USAC to correct this error. This item is required before the form can be data entered and reviewed.
FCC Form 471 Block 1 Items 1 and 3 Applicant Name and Contact Information	As long as there is sufficient contact information on the form to be able to make contact with someone, applicants can provide the missing contact information within 15 days of notification from USAC to correct this error. This information is required before the form can be data entered and reviewed.
FCC Form 471 Block 5 Item 13 and 14 Service Provider Identification Number (SPIN) and Name	If this information is missing completely, applicants will be able to submit the missing information within 15 days of notification from USAC. This information is required before the form can be data entered and reviewed.
FCC Form 471 Block 6 certification submission deadline	For applications completed within the filing window, applicants can file the certifications within 15 days of notification from USAC.
FCC Form 471 Block 6 Item 38 Signature of authorized person	Applicants who forget to sign their certification page can correct this error within 15 days of notification by USAC. To avoid this error, USAC encourages applicants to use their PIN to e-certify.

D. Errors that can be corrected by amending the Form 471

For the items listed below, applicants can amend their FCC Forms 471 without having to refile their application -- you need only to provide USAC with the information requested within 15 days of notification from USAC. Starting with Fund Year 2007, the notification from USAC will be on the Form 471 Receipt Acknowledgement Letter.

ERROR LOCATION	CORRECTIVE ACTION ALLOWED
FCC Form 471 Block 1 Billed Entity Contact Information	Applicants will be able to submit corrections to the contact information within 15 days of notification from USAC.
FCC Form 471 Block 4 Discount Calculations Worksheet	Applicants will be able to submit corrections to this item, even if it increases the discount rate, within 15 days of notification from USAC.
FCC Form 471 Block 5 Item 12 FCC Form 470 Application Number	Applicants will be able to submit corrections to this item within 15 days of notification from USAC.
FCC Form 471 Block 5 Item 13 and 14 Service Provider Identification Number (SPIN) and Name	Applicants will be able to submit corrections to this item within 15 days of notification from USAC as long as it is a <u>corrective SPIN change</u> .
FCC Form 471 Block 5 Item 15b Contract Number	Applicants will be able to submit corrections to this item within 15 days of notification from USAC.
FCC Form 471 Block 5 Item 16 Service Provider's Billing Account Number	Applicants will be able to submit corrections to this item within 15 days of notification from USAC.
FCC Form 471 Block 5 Item 18 Contract Award Date	Applicants will be able to submit corrections to this item within 15 days of notification from USAC, as long as the correction is accompanied by a certification.
FCC Form 471 Block 5 Item 22 Entities Receiving Service	Applicants will be able to submit corrections to this item, even if it causes an increase in the discount rate, within 15 days of notification from USAC. Applicants will also have an opportunity to remove entities post-commitment for purposes of the 2-in-5 Rule for Internal Connections.
FCC Form 471 Block 5 Item 23 Calculations	Applicants will be able to submit corrections to this item, even if it causes an increase in the funds requested, within 15 days of notification from USAC.
FCC Form 471 Block 6 Item 25d Amount budgeted for ineligible services	Applicants will be able to submit corrections to this item within 15 days of notification from USAC.

Reference Area - Schools and Libraries Division

Note to Applicants: Please check the address information to ensure you are contacting the correct Service Provider.

The absence of a "Y" in the Eligible Telecomm Provider column may simply indicate the company has not yet been researched by the SLD to determine if it is eligible to provide telecommunications services. Applicants are reminded that they should confirm this other information with their Service Provider.

Page 1 of 1
Results 1 - 1 of 1

SPIN	Service Provider Name	Contact Name	Contact Address	Contact Phone	Eligible Telecomm Provider	SPAC Filed
143029572	UIDC Telecom	Brad O Schaffer	520 SE Spruce , Roseburg, OR 97470	541492-3034	Y	2006

[New Search](#)[Done](#)

Questions about the SLD Program? Call our Client Service Bureau at (888) 203-8100.

For web site questions or comments please use the [Get Help!](#) form.

Exhibit C